

SAFEGUARDING AND CHILD PROTECTION POLICY

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Governing Body Committee with oversight	Pastoral, Safeguarding and Compliance Committee

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**Contact Details for Safeguarding and Child Protection Matters
at North London Collegiate School**

Role	Name	Position	Contact Details
WHOLE SCHOOL			
Designated Safeguarding Lead	Mrs Nicola Dawson	Deputy Head Pastoral	020 8951 6368 (School hours) NDawson@nlcs.org.uk
SENIOR SCHOOL			
Deputy Designated Safeguarding Lead	Ms Gayle Mellor	Head of Mental Health & Wellbeing	020 8951 6458 (School Hours) GMellor@nlcs.org.uk
Deputy Designated Safeguarding Lead	Mr Benjamin Tosh	Assistant Head (Head of Sixth Form)	020 8951 6427 (School hours) BTosh@nlcs.org.uk
Deputy Designated Safeguarding Lead	Mrs Natasha Taberner	Assistant Head (Head of Upper School)	020 4524 9922 (School hours) NTaberner@nlcs.org.uk
Deputy Designated Safeguarding Lead	Mrs Jo Demetriou	Assistant Head (Head of Middle School)	020 8952 0912 (School hours) JDemetriou@nlcs.org.uk
JUNIOR SCHOOL			
Deputy Designated Safeguarding Lead	Mr Richard Queripel	Head of Junior School	020 8951 6449 (School hours) RQueripel@nlcs.org.uk
Deputy Designated Safeguarding & EYFS Lead	Mrs Katie Bartram	Deputy Head of Junior School	020 8951 6449 (School hours) KBartram@nlcs.org.uk
Deputy Designated Safeguarding Lead	Mrs Kate Ivory	Deputy Head of Junior School (Academic)	020 3945 8977 (School hours) KIvory@nlcs.org.uk
Deputy Designated Safeguarding Lead	Mrs Leonie Marks	First School Pastoral Lead	020 4524 9474 (School hours) LMarks@nlcs.org.uk

GOVERNORS			
Chair of Governors	Mrs Gabrielle Gower	Whole School	North London Collegiate School, Canons, Canons Drive, Edgware, Middlesex, HA8 7RJ GGower@nlcs.org.uk Tel: 020 8952 0912
Vice Chair of Governors	Mr Peter Needleman	Whole School	North London Collegiate School, Canons, Canons Drive, Edgware, Middlesex, HA8 7RJ PNeedleman@nlcs.org.uk Tel: 020 8952 0912
Vice Chair of Governors	Ms Rowena Herdman-Smith	Whole School	North London Collegiate School, Canons, Canons Drive, Edgware, Middlesex, HA8 7RJ RHerdman-Smith@nlcs.org.uk Tel: 020 8952 0912
Nominated Safeguarding Governor	Dr Roma Patel	Whole School	North London Collegiate School, Canons, Canons Drive, Edgware, Middlesex, HA8 7RJ Rpatel@nlcs.org.uk Tel: 020 8952 0912
CANONS SPORTS CENTRE			
Designated Safeguarding Lead	Mrs Katie O’Leary Collen	Canons Sports Centre Manager	020 8951 5402 (Office hours) KOLeary@nlcs.org.uk
	Mr Steven Ballantyne	Canons Sports Duty Manager	020 8951 5402 (Office hours) Sballantyne@nlcs.org.uk

For School or Canons Sports Centre related issues, if the appropriate Designated Safeguarding Leads are unavailable, contact a Deputy Designated Safeguarding Lead for the School or Sports Centre, as appropriate.

During the school holidays, a safeguarding lead can be contacted by telephoning the school office on 020 8952 0912 or office@nlcs.org.uk (office hours only) who will refer the caller to the appropriate Designated Safeguarding Lead. In the event of an out of hours safeguarding concern each local authority has contact details on their website for their Safeguarding and Child Protection teams. In this case, please use the local authority in which the young person lives. If in doubt please contact the school’s Local Authority, Harrow: Tel: 020 8901 2690 (Mon-Fri 9am-5pm)

Tel: 020 8424 0999 (Out of hours)

Website: <https://www.harrowscb.co.uk/>

If there is any concern for a child’s immediate safety call 999.

EYFS only use Canons Sports Facilities in school hours so the relevant Safeguarding Lead would be Mrs Katie Bartram.

Key External Agencies, Services and Professionals' Contact Details

Harrow Children & Family Services

If there is a risk of immediate serious harm to a child and it is not possible to report to the Designated Safeguarding Leads, deputy Designated Safeguarding Leads, or the Head, a referral should be made to Children & Family Services immediately.

Tel: 020 8901 2690 (Mon-Fri 9am-5pm) - Harrow Golden Number
Tel: 020 8424 0999 (Out of hours)
Website: <https://www.harrowscb.co.uk/>

Harrow Strategic Safeguarding Partnership

Tel: 020 8901 2690 (Mon-Fri 9am-5pm)
Tel: 020 8424 0999 (Out of hours)
Website: <https://www.harrowscb.co.uk/>

Harrow Local Authority Designated Officer (LADO)

The Harrow LADO is Rosalind South

Tel: 07871 987 254 (Mon-Fri 9am-5pm)
Tel: 020 8901 2690
Tel: 020 8424 0999 (Out of hours)
Email: Rosalind.South@harrow.gov.uk / duty&assess@harrow.gov.uk

Harrow Multi Agency Safeguarding Hub (MASH)

Gavin Baker, Education Lead

Mobile: 07927 548070
Direct Dial: 020 8416 8664
Tel: 020 8901 2690 (Mon-Fri 9am-5pm)
Email: Gavin.Baker@harrow.gov.uk

Childline

Tel: 0800 1111
Website: www.childline.org.uk

NSPCC Helpline

Tel: 0808 800 5000

NSPCC Report Abuse in Education Helpline

Tel: 0800 136 663
Email: help@nspcc.org.uk

Forced Marriage Unit

Tel: 020 7008 0151
From overseas: +44 (0)20 7008 0151 (Mon – Fri 9am-5pm)
Out of hours: 020 7008 1500 (ask for the Global Response Centre) Email: fmf@fco.gov.uk

Metropolitan Police non-emergency contact number

Tel: 0300 123 1212 (24 hours, 7 days a week)

Harrow Police Station

Tel: 101

NSPCC Whistleblowing Advice Line

Tel: 0800 028 0285 (Mon–Fri 8am-8pm)

Email: help@nspcc.org.uk

Website: www.nspcc.org.uk/what-you-can-do/report-abuse/dedicatedhelplines/whistleblowing-advice-line/

General guidance on Whistleblowing

Website: www.gov.uk/whistleblowing

Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)

Tel: 020 7340 7264

Email: counter-extremism@education.gsi.gov.uk

Disclosure and Barring Service

Tel: 03000 200 190

Email: customerservices@dbb.gov.uk

Teaching Regulation Authority

Tel: 020 7593 5393

Email: misconduct.teacher@education.gov.uk

Independent Schools Inspectorate

Tel: 020 7600 0100

Email: concerns@isi.net

Domestic Abuse Helpline

Tel: 0808 2000 247 (24 hours)

Prevent Referrals / Channel Programme:

In the event of any concerns about a child being radicalised a referral should be made to Children & Family Services immediately.

Tel: 020 8901 2690 (Mon-Fri 9am-5pm) - Harrow Golden Number

Tel: 020 8424 0999 (Out of hours)

Website: <https://www.harrowscb.co.uk/>

1 Introduction

- 1.1 North London Collegiate School (the School) is fully committed to the safeguarding and welfare of children, and expects all members of the School community to share this commitment. The School community forms part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone's responsibility. To fulfil this responsibility effectively all professionals should adopt a child-centered approach, and consider, at all times, what is in the best interests of the child.
- 1.2 The Department for Education's (DfE) statutory guidance 'Keeping Children Safe in Education' defines safeguarding and promoting the welfare of children as *'protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.'* Children includes everyone under the age of 18.
- 1.3 Staff are advised to maintain an attitude of 'It could happen here' where safeguarding is concerned. If staff are concerned about the welfare of a child, they should always act in the **best interests of the child**. If staff are unsure about any aspect of safeguarding they should immediately speak to the Designated Safeguarding Lead (DSL), or a deputy DSL, without delay, and should not assume that a colleague will raise the matter and share information that may keep a child safe. Details of the School's DSL and deputy DSLs are set out in the grid on pages 3-4.
- 1.4 This policy must be read in conjunction with the following which are available on the School [website](#):
 - Anti-bullying Strategy
 - Behaviour Policy
 - Bereavement Policy
 - Code of Conduct for Staff (internal document)
 - Data Protection Policy
 - Digital Safety Policy for Pupils
 - Digital Safety Policy for Staff (internal document)
 - Listening to Pupils
 - Missing Pupil Policy (internal document)
 - Pastoral Care Policy
 - Personal, Social, Health, & Economic (PSHE) Education Policy
 - Procedure in the event of a death of a pupil (internal document)
 - Recruitment, Selection and Disclosure Policy
 - Registration and Attendance Policy
 - Relationships and Sex Education Policy
 - Special Educational Needs and Disabilities Policy
 - Terms and Conditions
 - [Visiting Speakers Policy](#) (internal document)
 - Wellbeing Policy
 - Whistleblowing Policy (internal document)
- 1.5 This is a whole school policy which applies from the Early Years Foundation Stage (EYFS) to sixth form, as well as the Canons Sports Centre and any of the School's other subsidiaries. Any reference to child, pupil or Governor in this policy equally applies to a child, vulnerable adult or Director in the context of any of the School's subsidiaries.
- 1.6 This policy is available on the School website.
- 1.7 Copies of the above policies are held at the Senior School Office for consultation by parents. You may also email the School at Office@nlcs.org.uk to request hard copies which can be made available in large print

or other accessible format if required.

2. Aims and objectives

2.1 The School aims to:

- provide a positive, supportive and secure environment where pupils know that there are adults in School whom they can approach if they need help
- have clear guidelines for staff for identifying and reporting cases, or suspected cases, of abuse including neglect, physical abuse, emotional abuse or sexual abuse
- support pupils who may have been abused by encouraging self-esteem through the PSHE programme, through use of online resources and the School Counsellors

2.2 Keeping Children Safe in Education ensures that the inspection of independent schools will cover the Independent School Standards Regulations, which in turn concerns the welfare, health and safety of children are met.

2.3 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and in all proper circumstances will be referred to an external agency such as Harrow Children and Family Services department, the child protection unit of the police or the NSPCC, without delay or investigation within the School.

2.4 In cases of serious harm, including reports of rape, assault by penetration, sexual assault, Female Genital Mutilation and Radicalisation, the police will be informed from the outset.

2.5 Any doubts or concerns over apparently borderline cases will be discussed informally with Children and Family Services or the LADO, as applicable, initially on a “no names” basis. The School's child protection procedures are not intended to prevent any person from making an immediate referral to Children and Family Services if there is a risk of immediate serious harm to a child.

3. Statutory and regulatory framework

3.1 This policy complies with and / or has regard to the following:

- [The Education \(Independent School Standards\) Regulations \(2014\)](#)
- [Keeping children safe in education 2025](#)
- [Working Together to Safeguard Children \(February 2024\)](#)
- [Early Years Foundation Stage \(EYFS\) Statutory Framework \(January 2024\)](#)
- [Disqualification under the Childcare Act 2006 \(August 2018\)](#)
- [What to do if you're worried a child is being abused: advice for practitioners \(March 2015\)](#)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(May 2024\)](#)
- [Revised Prevent Duty Guidance for England and Wales \(March 2024\)](#)
- [The Prevent Duty: Safeguarding learners vulnerable to radicalisation \(September 2023\)](#)
- [The use of social media for online radicalisation \(July 2015\)](#)
- [Multi-agency guidance on female genital mutilation \(July 2020\)](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(September 2020\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(September 2021\)](#)
- [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(March 2024\)](#)
- [Searching, Screening and Confiscation \(July 2022\)](#)
- [Promoting and supporting mental health and wellbeing in schools and colleges \(May 2024\)](#)
- [Developing and implementing a low-level concerns policy: A guide for organisations which work with children \(September 2023\)](#)

- Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk) ([May 2024](#))
- [Working together to improve school attendance - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\) \(March 2024\)](#)
- [General Data Protection Regulation \(EU 2016/679\)](#)
- [Data Protection Act 2018](#)
- [ICO guidance Taking photographs in schools](#)

4. Scope and responsibilities

- 4.1 All members of the School community, including but not limited to, the Head, staff, Governors, pupils, parents, visitors, volunteers, supply staff and Canons Sports Centre are expected to comply with this policy and its procedures. It applies wherever members of the School community are working with pupils even where this is away from the School, for example, at an activity centre or on an educational visit.
- 4.2 The Governing Body facilitates a whole school approach to safeguarding and child protection ensuring it is at the forefront and underpins all relevant aspects of process and policy development. It is the responsibility of the Governing Body to ensure that the School complies with its legislative duties and the Department for Education's statutory guidance Keeping Children Safe in Education to ensure that the School's policies, procedures and training are effective and comply with the law. The Governing Body will constantly monitor the effectiveness of the implementation of this policy and will revise it where necessary. The Governors will ensure that any changes in this policy will be drawn to the attention of all staff.
- 4.3 The Governing Body has nominated one of its members to manage child protection incidents on behalf of the Governing Body and to liaise with external agencies where required. The nominated Safeguarding Governor is Mrs Nina Kingsmill Moore.
- 4.4 The Directors of the School's subsidiaries will satisfy themselves that safeguarding matters relating to the subsidiaries are managed and monitored in accordance with this policy.
- 4.5 The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out safeguarding duties, encourage a culture of listening to pupils and to monitor the effectiveness of policies and procedures in practice. Further information about the DSL's responsibilities are located at pages 23 - 26.
- 4.6 Where there is a safeguarding concern, the Governing Body, Senior Team and DSL wherever possible will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide, and will follow locally agreed procedures in all cases.

5. Early help

- 5.1 All staff play an important role in safeguarding and promoting the welfare of children and should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. This may be done for example, by immediately speaking with the DSL, or their deputies, regarding any concerns or emerging issues, sharing information with other professionals to support early identification and assessment etc. Taking these steps may prevent concerns from escalating.
- 5.2 Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
 - is disabled or has certain health conditions and has specific additional needs;
 - has special educational needs (whether or not they have a statutory Education, Health and Care

plan);

- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour-based' abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

5.3 The School will also be alert to the potential need for early help for a child who comes from a split family, looked after children, previously looked after children and care leavers. The DSL will inform the form tutor about the child's circumstances. The form tutor will monitor the child and put in place any necessary special arrangements and support.

6. Contextual safeguarding

6.1 All staff, including the DSL and their deputies, should consider the context within which safeguarding incidents and/or behaviours occur. This is known as 'contextual safeguarding' which expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts and should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Contextual safeguarding looks at how we can better understand these risks and engage with children and young people in order to help to keep them safe.

6.2 The DSL, and their deputies where appropriate, are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns. However, in the unlikely event of the DSL and all deputy DSLs being unavailable, staff must speak to a member of the Senior Team regarding any safeguarding concerns and/or take advice from and may report safeguarding concerns directly to Harrow's Children & Family Services. In these circumstances, the DSL or a deputy DSL should be informed of any action taken as soon as possible.

7. Information sharing

7.1 The HM Government guidance, [Information Sharing: Advice for Practitioners](#) Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Staff should be mindful that sharing information at an early stage is essential for effective safeguarding and promoting the welfare of children. Page 4 of this advice sets out the seven golden rules to sharing information, whilst page 9 confirms that "The General Data Protection Regulation and the Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe". Page 21 of [Working Together to Safeguard Children](#) contains a useful myth-busting guide to information sharing within a safeguarding context. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

8. Harrow Strategic Safeguarding Partnership

8.1 The School recognises its responsibility to put in place effective procedures both for detecting and preventing abuse and for ensuring that parents, staff and Governors are aware of the School's role in this

respect, in line with locally agreed inter-agency procedures. As of September 2019, the School's three safeguarding partners are Harrow Council, the Harrow Clinical Commissioning Group and the Metropolitan Police. A full copy of Harrow Council's Safeguarding Partnership Arrangements is available here:

<http://www.harrowscb.co.uk/wpcontent/uploads/2019/06/Harrow-Safeguarding-Children-Arrangements-May2019.pdf>

9. Summary of reporting procedures

- 9.1 If a member of the School community suspects or discovers that a pupil is the victim of abuse, whether physical, emotional, sexual or as a result of neglect, she/he must immediately inform the DSL, or their deputies, except in the case of an allegation which itself involves the DSL, in which case the matter should be reported directly to the Head in accordance with the procedures set out in Appendix 1.
- 9.2 If the suspicion relates to a member of staff, including the DSL, volunteer, supply staff, a Governor or the Head, the matter must be dealt with in accordance with the procedures set out in Appendix 1.
- 9.3 Contact details for the Harrow Strategic Safeguarding Partnership, the Local Authority Designated Officer (LADO) for Child Protection and other bodies mentioned in this policy are located at pages 5-6.

10. Types of abuse and neglect

- 10.1 All staff should be aware that firstly, abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition and, in most cases, multiple issues will overlap with one another. Secondly, harmful behaviours such as substance abuse, sexting and truancy can put children in danger, and thirdly; that safeguarding incidents and/or behaviours can be associated with factors outside the School and / or can occur between children outside of these environments.
- 10.2 All staff, but especially the DSL and their deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including but not limited to sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- 10.3 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases abuse can take place concurrently online and offline.
- 10.4 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- 10.5 All staff should also be aware that children can abuse their peers online. This can take the form of abusive, harassing and misogynistic messages, the nonconsensual sharing of indecent images and the sharing of abusive images and pornography, to those who do not want to receive such content.
- 10.6 Keeping Children Safe in Education defines types of abuse and neglect as follows:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or

technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

11. Specific forms of abuse and safeguarding issues

11.1 Annex B of Keeping Children Safe in Education contains information about specific forms of abuse and safeguarding issues including:

Child abduction and community safety incidents: child abduction is the unauthorised removal or retention of a minor for a parent or person with legal responsibility for the child. Child abduction can be committed by parents, family members, those known to the family but not related to the victim and by strangers.

Children missing or absent from education: a child going missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, abuse, sexual abuse and child sexual and criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of traveling to conflict zones, risk of Female Genital Mutilation, 'honour'-based abuse

or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. The school routinely monitors student attendance and the relevant members of the safeguarding team are made aware when attendance falls below 90% in order to best support the student and their family. Reduced timetables must be exceptional, short-term and well-monitored and persistent part-time absence will be tracked.

Staff should follow the School's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risks of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. The School's procedures are set out in the Missing Pupil Policy. The DSL will monitor unauthorised absence particularly where children go missing on repeated occasions.

The School will fulfil its statutory duty in notifying the Local Authority (Harrow) when adding or removing a pupil's name from the admission register outside of the usual transition points in line with The Education (Pupil Registration) (England) Regulations 2006 i.e., where a compulsory school-aged child leaves a school before completing the school's final year or joins a school after the beginning of the school's first year. The School will make reasonable enquiries to establish the whereabouts of the child jointly with the Local Authority before deleting their name from the register and will also notify the Local Authority within five days of adding a pupil's name at a non-standard transition point.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person under the age of 18 into taking part in sexual or criminal activity. Children can be exploited by adult males or females, or by other children who themselves may be experiencing exploitation. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

Child Criminal Exploitation: some specific forms can include children being forced or manipulated into transporting drugs or money through county lines, shoplifting etc. Children can be forced into committing vehicle crime, threatening/committing serious violence to others or forced into carrying weapons such as knives. They may have been criminally exploited even if the activity appears to be something they have agreed to or consented to. The experiences of girls being criminally exploited can be very different to boys, and indicators may not be the same. Children being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation: is a form of child sexual abuse. The abuse may involve physical contact including assault by penetration or nonpenetrative acts, or noncontact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Child Sexual Exploitation and Child Criminal Exploitation can also occur through the use of technology. Like all forms of abuse exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posting on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of Child Criminal Exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education.

The above Child Criminal Exploitation indicators can also be indicators of Child Sexual Exploitation, as can:

- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant;

County lines: is a term used by the UK Government to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Individuals and drug gangs could target children from all walks of life, social or ethnic backgrounds and staff should always be alert to signs of coercion or exploitation.

So-called ‘Honour’-based abuse: So-called ‘honour’-based abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation, forced marriage, and practices such as breast ironing.

Serious violence: All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of

self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, being frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Links to further guidance/advice can be found at Appendix 6.

Female Genital Mutilation (FGM): comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Whilst all staff should speak to the DSL, or a deputy DSL, with regard to any concerns about FGM, there is a specific **legal duty on teachers** to personally report to the police cases where they discover that an act of FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they should not be examining pupils. If a student discloses an injury which causes concern possibly relating to FGM staff may consult the National FGM Helpline on 08000 283 550. Staff failing to report such cases will face disciplinary sanctions.

It is also School policy that any member of staff, other than a teacher, should follow the above procedure where they discover an act of FGM appears to have been carried out, as this represents best practice.

Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Designated Safeguarding Lead and involve Children and Family Services as appropriate. The duty does not apply in relation to at risk or suspected cases i.e., where the teacher does not discover that an act of FGM appears to have been carried out or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Modern Slavery and the National Referral Mechanism: encompasses human trafficking and slavery, servitude and forced or compulsory labour. Information on signs that someone may be a victim of modern slavery and how to refer them to the National Referral Mechanism is found here: [Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](https://www.gov.uk/modern-slavery-how-to-identify-and-support-victims)

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' i.e., crimes that can happen offline but are enabled at scale and at speed online, or 'cyber-dependent' crimes that can be committed only by using a computer.

Mental health: All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, they must immediately speak to the DSL or a deputy.

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#).

[Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance '[Promoting children and young people's emotional health and wellbeing](#)'. Its resources include social media, forming positive relationships, smoking and alcohol.

Forced marriage: A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Forcing a person into a marriage is a crime in England and Wales. There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses. The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email: fmu@fco.gov.uk

Domestic abuse: the Domestic Abuse Act 2021 defines domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition ensures that different types of relationships are captured, including ex-partners and family members, and captures a range of different abusive behaviours, including psychological, sexual, physical, emotional, economic, and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" as defined in the Act.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse regardless of gender, age, ethnicity, socio-economic status, sexuality or background. Domestic abuse can take place inside or outside the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships – this is sometimes referred to as 'teenage relationship abuse'. If one or both parties are under 16 this may not be recognised in law as domestic abuse and child safeguarding procedures should be followed. Both the young victim and perpetrator should be offered support.

Operation Encompass: operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children which explain each step of the process and support and special measures available:

- <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to11-year-olds>

- <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

Children with family members in prison: These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides an information service for all professionals who come into contact with the children and families of offenders. Further information can be found here:

- <https://www.nicco.org.uk/>

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL, and deputies, should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Sexual violence and Sexual Harassment: can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children, and can occur online and offline. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that girls, children with Special Educational Needs and Disabilities and LGBTQ+ children are at greater risk.

In addition to the above, Annex B also lists Children and the court system, Children with family members in prison and Child criminal exploitation as specific forms of abuse and safeguarding issues. Further guidance/advice regarding all of the above can be seen at Appendix 6.

Preventing radicalisation: radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. It can happen in many different ways and settings. The School and its staff have a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The Government's Counter Extremism Strategy defines 'Extremism' as: "the vocal or active opposition to our fundamental British values, including, democracy, the rule of law, individual liberty and the mutual respect and tolerance for those of different faiths and beliefs. We also regard calls for the death of members of our armed forces, as extremist."

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

It is important to also consider 'incel culture' as an aspect of extremism and for staff to be alert to concerns raised, or comments made, by students or staff about their own views or those of others. If a concern relates to a member of staff the matter should be reported to Head or, in her absence, the DSL.

The School seeks to promote an understanding of and commitment to fundamental British values such as democracy, the rule of law, individual liberty, tolerance and respect for other people. Pupils are able to discuss sensitive topics, including terrorism and extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues and the School and its staff should be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could

indicate that they may be in need of help or protection. Staff should use their judgment in identifying children who might be at risk of radicalisation and act proportionately. Staff are encouraged to discuss their concerns with the DSL who can advise on assessing the level of risk to identify the most appropriate referral, which could include making a referral to the Channel programme or Children's Social Care.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. It is a voluntary process which allows the individual to withdraw from the programme at any time.

All staff are encouraged to familiarise themselves with the government's website www.educateagainsthate.com. The website is designed to equip school leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

The School has a risk assessment process in place for considering and protecting children at risk of radicalisation and extremism.

12. Signs of possible abuse

12.1 Possible signs and behaviours which may indicate that a child is being abused include, but are not limited to:

- significant changes in children's behaviour,
- deterioration in children's general well-being,
- persistent absence or lateness, particularly when unexplained or reason gives cause for concern
- unexplained bruising, marks or signs of possible abuse or neglect,
- children's comments which give cause for concern,
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
- inappropriate behaviour displayed by other members of staff for example excessive one to one attention beyond usual role or responsibilities,
- repeated minor injuries,
- children who are dirty, smelly, poorly clothed or who appear underfed,
- children who have lingering illness which are not attended to, deterioration in School work, or significant changes in behaviour, aggressive behaviour, severe tantrums,
- an air of "detachment" or "don't care" attitude,
- overly compliant behaviour,
- a "watchful attitude",
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age),
- a child who is reluctant to go home, or is kept away from School for no apparent reason,
- does not trust adults, particularly those who are close,
- "tummy pains" or other persistent ailment/injury with no medical reason,
- eating problems, including over-eating, loss of appetite,
- disturbed sleep, nightmares, bed wetting,
- running away from home, suicide attempts,
- self-inflicted wounds,
- reverting to younger behaviour,
- depression, withdrawal,
- relationships between child and adults which are secretive and exclude others,
- pregnancy.

12.2 These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of

them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

- 12.3 Staff should bear in mind that additional difficulties may exist when recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration, that children with SEND can be disproportionately impacted by, for example, bullying without outwardly showing any signs, and there can be communication barriers in overcoming these difficulties.

13. Child sexual violence and sexual harassment

- 13.1 The School has a zero-tolerance approach to sexual violence and sexual harassment. Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment can occur online and face to face, both physically and verbally, on School premises or outside of School and are never acceptable. All staff are advised to maintain an attitude of 'it could happen here' and be aware that safeguarding incidents and/or behaviours can be associated with factors outside of School, including intimate personal relationships.

- 13.2 Sexual offences under the Sexual Offences Act 2003 are defined as follows:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

- 13.3 Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs.
- 13.4 Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Within this policy, sexual harassment is referred to in the context of child on child sexual harassment.
- 13.5 Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include but is not limited to:
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
 - sexual "jokes" or taunting;
 - physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
 - online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats; and
- up-skirting

13.6 Staff should be aware that children may not find it easy to tell staff about their abuse verbally and may show signs or act in ways that they hope adults will notice and react to. If staff have any concerns about a child's welfare, they should act immediately rather than wait to be told. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. The victim should never be made to feel that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim be made to feel ashamed for making a report or their experience minimised. It is important for staff to explain to pupils that the law is in place to protect them rather than criminalise them, and this should be explained in a way that avoids alarming or distressing pupils.

13.7 If a pupil makes a disclosure directly to a member of staff or volunteer he/she must follow the process as set out under 'What to do if a pupil makes a disclosure' on page 26-27 of this policy. Staff are reminded not to view or forward illegal images of a child.

13.8 When there has been a report of sexual violence, the DSL, or their deputies, should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case by case basis.

13.9 Victims may not disclose the whole picture immediately and may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged and the School will ask the victim if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victim's. The person to whom the victim discloses should recognise that the victim has placed them in a position of trust, and they should be supportive and respectful.

13.10 In response to reports of child on child sexual violence and/or sexual harassment the School will act in accordance with Part 5 of Keeping Children Safe In Education and the DfE advice Sexual Violence and Sexual Harassment between Children in Schools and Colleges. The School will:

- reassure the victim that they will be taken seriously, and they will be protected and supported
- not promise confidentiality at the initial stage. Staff will only share the report with those who are necessary in order to progress it
- respond in line with the safeguarding procedures outlined in this policy
- where a concern includes an online element, follow DfE guidance: [Searching, screening and confiscation at school](#) and UK Council for Internet Safety guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). Staff should not view or forward illegal images of a child. Wherever possible responses to incidents should be based on what the DSL has been told about the content of the imagery
- manage any such reports with two members of staff present one of which must be the DSL or a deputy DSL
- keep in mind that certain children may face additional barriers to telling someone because of their disability, ethnicity, sexual orientation etc.

13.11 Where there has been a report of sexual violence, the DSL will make and record an immediate risk and needs assessment.

13.12 Where there has been a report of sexual harassment, the DSL will consider the need for a risk assessment on a case-by-case basis.

13.13 The risk and needs assessment will consider and keep under review:

- the victim, their protection and support;
- the alleged perpetrator, their protection and support; and
- all the other children (and, if appropriate, staff), and any actions that are appropriate to protect and support them.

13.14 The DSL will engage children's social care, the police and specialist services as required. Any risk assessments undertaken by the other agencies/services will be used to inform the School's risk assessment. Important considerations that will be taken into account include:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages and developmental stages of the children involved
- any power imbalance between the children e.g. age difference, disability or learning difficulty
- if the alleged incident is a one-off or a sustained pattern of abuse
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- any ongoing risks to the victim, other children or staff
- other related, contextual issues e.g. in the community/local environment
- if both the alleged perpetrator and victim attend the School, how best to keep them at a reasonable distance apart (including on transport)

13.15 Where appropriate, the management of such cases will be agreed with in consultation with children's social care and/or the police or other specialist service. There are four possible routes – all underpinned by the principle that such behaviour is never acceptable and will not be tolerated:

- Manage internally - In some case of sexual harassment, e.g. one-off incidents, it might be appropriate to handle the incident internally utilising the Behaviour Policy and Anti-bullying strategy and by providing pastoral support.
- Early Help – Providing early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
- Referrals to children's social care – Where a child has been harmed, is at risk of harm, or is in immediate danger, the School will make a referral to children's social care, who will determine whether any of the children involved are in need of protection or other services. Referring to children's social care should not delay the School from taking immediate action to protect the victim and other children. However, the School will ensure that any such actions do not jeopardise a statutory investigation.
- Reporting to the Police – Any report to the police by the School will generally be in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the matter should be passed on to the police. If the alleged perpetrator is under ten (below the age of criminal responsibility), the principle of reporting to the police remains. The police will take a welfare approach, rather than a criminal justice approach. The same approach applies to reports of historic cases.

13.16 The School will consult the police and agree what information can be disclosed to staff and others and in particular to the alleged perpetrator and their parents/carers. The School will also discuss the best way to protect the victim and their anonymity.

13.17 With all routes outlined above, it is vital that all concerns, decisions and reasons for decisions are recorded in writing. The School will ensure that the necessary follow up steps are taken.

13.18 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and lesbian, gay, bi or trans (LGBTQ+) children are at greater risk.

13.19 The School recognises and signposts external resources such as the Lucy Faithfull Foundation's 'Shore Space' service for young people concerned about sexual thoughts or behaviour. The DSL may also draw on guidance from the Centre of Expertise on CSA and the Children's Society's CSE Prevention resources, referenced in KCSIE 2025 Annex B

14. Relationships and Sex Education

14.1 The Relationships Education, Relationships and Sex Education and Health Education Regulations (England) Regulations 2019 states that as of the summer term 2021 pupils receiving primary education must be taught Relationships Education, and pupils receiving secondary education must be taught Relationships and Sex Education. Health education is not compulsory for independent schools.

14.2 Personal, Social, Health and Economic Education (PSHE) continues to be compulsory in independent schools; the School provides PSHE lessons from Reception to Year 13.

14.3 The DfE guidance gives schools freedom to deliver the content set out in the guidance in the context of a broad and balanced curriculum. The Junior School delivers RSE as set out in the Junior School curriculum plan, whilst the Senior School delivers RSE as part of a timetabled PSHE programme supplemented with extra-curricular talks and activities.

14.4 The School seeks to work in partnership with parents to enable parents to feel confident about the Relationships and Sex Education programme, and that it will be delivered sensitively and inclusively respecting backgrounds and beliefs. The specific RSE curriculum plan and PSHE programme is circulated to parents in the Autumn Term, with parents being invited to make suggestions for development as part of the School's ongoing consultation process. The Relationships and Sex Education Policy is published on the School website

15. The use of reasonable force or physical restraint

15.1 Physical restraint: All forms of corporal punishment are unlawful; the School does not use or threaten corporal punishment. The use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided if possible. There are circumstances when it is appropriate for staff to use force to safeguard children. This is enshrined in law and applies to any member of staff at the School. It can also apply to people whom the Head has temporarily put in charge of pupils, such as unpaid volunteers or parents accompanying pupils on a school organised visit.

15.2 There are circumstances when it is appropriate for staff to use reasonable force to safeguard a child. Reasonable force means using no more force than is needed. It may involve either passive physical contact (e.g. standing between pupils) or active contact (e.g. guiding a pupil by the arm).

15.3 All members of staff have a legal power to use reasonable force. This applies both on and off school premises where they have lawful control of a student. The decision to use force should be based on the professional judgement of staff and should always consider the individual circumstances, especially the needs of pupils with SEND or medical conditions.

15.4 Staff must take extra care when using reasonable force with children who may be more vulnerable to its impact, including those with autism, ADHD, trauma history or other additional needs.

15.5 From September 2025, in line with emerging statutory guidance, the school will:

- Record all **significant incidents** involving the use of force.
- Inform **parents/carers** as soon as practicable.
- Review data on such incidents to inform practice and training.

15.6 All incidents involving the use of reasonable force should be reported immediately to the DSL, recorded using the school's safeguarding system, and followed up with appropriate pastoral or behaviour support as needed.

15.7 Application of code of restraint: This only applies where no other form of control is available and where it is necessary to intervene. The use of force or physical contact may be reasonable and proportionate in the circumstances to prevent a pupil doing, or continuing to do any of the following:

- a. Committing a criminal offence;
- b. Injuring themselves or others;
- c. Causing damage to property, including their own; or
- d. Engaging in any behaviour prejudicial to good order and discipline at the School or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

15.8 Before intervening: Before intervening physically staff should, wherever practicable, tell the pupil to stop and what will happen if they do not. Staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. Staff should always avoid touching or holding a pupil in a way that might be considered indecent. Staff should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury. Under no circumstances should staff or other adults working at or visiting the school restrain a pupil in such a way as to restrict airways.

15.9 Inform senior staff: Staff should inform the DSL immediately following an incident, except the most minor or trivial, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. Staff should provide a written report as soon as possible afterwards. This should include written and signed accounts of those involved, including the pupil. The parents, guardians or carers of the pupil should be informed about serious incidents involving the use of force. In the EYFS setting, the parents, guardians or carers will be informed about any use of force on the same day or as soon as is reasonably practical. The Deputy Head (Pastoral) or Head of Junior School will advise as to when parents should be contacted.

15.10 Action taken in self-defence or in an emergency: The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

15.11 Using reasonable force: There is no legal definition of "reasonable force". It will always depend on the circumstances. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Note that:

- Any use of force should be proportionate to the behaviour of the pupil involved and the seriousness of the harm prevented;
- Staff should recognise the additional vulnerability of children with SEND and certain medical conditions before using reasonable force;
- Physical force could not be justified to prevent a pupil from committing a trivial misdemeanour;
- Any force should always be the minimum needed to achieve the desired result; or
- Whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding and sex of the pupil.

16. Designated Safeguarding Lead

- 16.1 The DSL is a member of the Senior Team and takes lead responsibility for safeguarding and child protection (including online safety). The School will ensure that the DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.
- 16.2 Deputy DSLs are trained to the same level as the DSL. Whilst the activities of the DSL can be delegated to deputy DSLs, the ultimate lead responsibility for child protection remains with the DSL.
- 16.3 Parents or Canons Sport Centre users are welcome to approach the DSL if they have any concerns about the welfare of any child in the School or Sports Centre, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form teacher who will notify the relevant DSL in accordance with these procedures.
- 16.4 In accordance with Annex C of Keeping Children Safe in Education, the main responsibilities of the DSL are:

Managing referrals

- To take lead responsibility for promptly referring all cases of suspected abuse and neglect of any pupil at the School to Harrow's Children and Family Services or to the relevant Local Authority;
- To support staff who make direct referrals to Harrow's Children and Family Services (or to the relevant LA)
- To refer cases to the Channel programme where there is a radicalization related concern;
- To support staff who make direct referrals to the Channel programme;
- To take lead responsibility for promptly referring to the Local Authority Designated Officer all child protection concerns which involve a member of staff;
- To take lead responsibility for promptly making referrals to the Disclosure and Barring Service (DBS) (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child; and
- To take lead responsibility for promptly making referrals to the police where a crime may have been committed which involves a child. The National Police Chiefs' Council advice '[When to call the police](#)' should assist the DSL, Head and the safeguarding team understand when they should consider calling the police and what to expect when they do.
- If a student moves school to share any safeguarding records within 5 days during the year or within the first week of new academic year.
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place.
- To take responsibility for staff training regarding Safeguarding and Child Protection matters (annual) and on joining the school through their induction programme.

Working with others

- To act as a source of support, advice and expertise for all staff;
- To act as a point of contact with the three safeguarding partners;
- To take lead responsibility in early help cases and liaise with other agencies;
- To liaise with the Head in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the School;
- To liaise with the 'Case Manager' and Local Authority Designated Officer regarding all child protection concerns which involve a member of staff;
- To work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at School. This includes:
 - ensuring the School knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- To liaise with staff (especially pastoral support staff, the School Nurse, IT Technicians and SEND advisors) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

Raising awareness

- To ensure each member of staff has access to, and understands this policy and procedures, especially new and part-time staff;
- To ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;
- To ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made to Children and Family Services and the School's role in this;
- To maintain links with the Harrow Strategic Safeguarding Partnership to ensure staff are aware of training opportunities and the latest local policies on safeguarding;
- To help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and Senior Team; and
- To ensure that the School's PSHE programme teaches pupils about safeguarding, including safer use of the internet and social media.

Information sharing and managing the child protection file

- To ensure child protection files are kept up to date, kept confidential and stored securely;
- Records should include:
 - a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.
- Ensure the file is only accessed by those who need to see it and where shared, this happens in accordance with information sharing advice as set out in Parts one and two of Keeping Children Safe in Education;
- Where children leave the School, to ensure their child protection file is transferred to the new school or college as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The file should be transferred separately from the main pupil file, ensuring secure

transit, and obtaining confirmation of receipt.

- Consider whether it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue support and have that support in place for when the child arrives.
- The School retains child protection files indefinitely where a referral has been made/social care have been involved or a child has been the subject of a multiagency plan. Where there are low level concerns with no multi-agency involvement the School will consider retaining the child protection file for 25 years from date of birth or indefinitely.

Training, knowledge and skills

- To undergo training, at least every two years, to acquire the knowledge and skills required to carry out the role;
- To undertake Prevent awareness training annually; and to ensure knowledge and skills are refreshed at regular intervals, as required, but at least annually to keep abreast of developments relevant to their role so they:
 - Understand the assessment process for providing early help and statutory intervention;
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and effectively contribute when required to do so;
 - Understand the importance of the role the DSL has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
 - Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing; and what is needed in responding to this in promoting educational outcomes;
 - Are alert to the specific needs of children in need, those with Special Educational Needs and/or Disabilities (SEND), those with relevant health conditions and young carers;
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation;
 - Understand the importance of information sharing, both within the School and with the safeguarding partners, other agencies, organisations and practitioners;
 - Are able to keep detailed, accurate, secure written records of concerns and referrals;
 - Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
 - Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
 - Can recognise the additional risks that children with Special Educational Needs and/or Disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with Special Educational Needs and/or Disabilities to stay safe online;
 - Obtain access to resources and attend relevant refresher training courses; and
 - Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measure the School puts in place to protect them; and
 - Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
 - Where appropriate, make use of the DfE's 'Plan Technology for Your School' service to assess filtering, monitoring, and digital safeguarding infrastructure

17. What to do if a pupil makes a disclosure

17.1 If a pupil discloses directly to a member of staff or volunteer he/she must:

- listen carefully and non-judgmentally to what is said and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place
- ask only open questions such as ‘How did that happen’?
 - what was happening at the time?
 - anything else you want to tell me?
- not ask leading questions which may be considered as suggesting what might have happened, or who has perpetrated the abuse, as this can later be interpreted as putting ideas into the child’s mind
- NEVER GIVE UNDERTAKINGS OF ABSOLUTE CONFIDENTIALITY TO A PUPIL; breaking a child’s confidence would be inappropriate, it is better to say that you might have to tell someone who will ensure the correct action is taken
- make notes of the details of the disclosure using the child’s words where possible. These notes should be made within one hour using CPOMS or the ‘Record of Concern’ form at Appendix 8 (hard copies are available in the DSL’s and Deputy DSLs’ pigeon holes in the staffrooms and with the Deputy Heads’ PA). The DSL or one of the Deputy DSLs can support staff to record the disclosure.
- reassure the child they have done the right thing and tell them they are not to blame
- offer ongoing support

17.2 The ‘Record of Concern’ form / CPOMS record should:

- be accurate and descriptive, including the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence
- not make assumptions
- not include any opinions
- indicate sources of information
- be clear and concise
- be signed by the person making it and use names, not initials
- be kept securely and handed to the DSL or submitted via CPOMS as soon as possible
- All evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be safeguarded and preserved and passed to the DSL
- Records will be kept securely within applicable pupil files.
- The retention period for the records will vary depending on the nature of the disclosure.

17.3 All suspicions or complaints of abuse must be reported immediately to the relevant DSL (except in the case of an allegation which itself involves a DSL, in which case the matter should be reported directly to the Head in accordance with the procedures set out in Appendix 1 below).

17.4 In the DSL’s absence, any suspicion or complaint of abuse relating to a pupil should be reported immediately to a deputy DSL.

17.5 In the absence of the Canons Sports Centre DSL any suspicion or complaint of abuse relating to child or vulnerable adult in Canons Sports Centre should be reported immediately to the School’s DSL.

17.6 All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing and securely stored by the DSL.

17.7 If there is a risk of immediate serious harm to a child and it is not possible to report to the DSL or the Head, a referral should be made to Children and Family Services immediately – Children and Family Services, Civic Centre 1, Station Road, Harrow HA1 2XY Tel: 020 8901 2690.

18. Confidentiality and Communicating with Parents

18.1 Staff, supply staff or volunteers who receive sensitive information about children and their families should

only share this information with appropriate professionals.

18.2 Parents will be made aware of the School's Safeguarding and Child Protection Policy and its availability on the School website.

18.3 Parents should be informed prior to referrals being made to other agencies, unless to do so might place the child at further risk or cause evidence to be removed or destroyed. The DSL might consult the relevant local authority on whether this should or should not be done.

18.4 The DSL will ensure that the School's information sharing arrangements comply with government guidance. Any written communications containing sensitive information must only be sent to other professionals on a need to know basis, using secure mail processes e.g. secure email.

19. Investigation, referral and reporting

19.1 The Governing Body will ensure that staff and volunteers are aware that it is their responsibility to:

- protect children from abuse
- be aware of the School's child protection procedures in this policy
- know how to access and implement the procedures, independently if necessary
- keep a sufficient record of any significant complaint, conversation or event
- report any matters of concern to the Designated Safeguarding Lead
- undertake appropriate training, including refresher training which will be updated regularly in accordance with the Harrow Strategic Safeguarding Partnership requirements

19.2 It is not the responsibility of School staff to investigate suspected abuse. The School is not an investigation or intervention agency for child protection, but it has an important role to play at the recognition and referral stages. The School will take into account the procedures published by Harrow Strategic Safeguarding Partnership when dealing with allegations of abuse. The Harrow Strategic Safeguarding Partnership can be contacted at: Assessment Team, Second Floor, Civic Centre, Station Road, Harrow HA1 2UL Tel: 020 8901 2690 (9.00 am – 5.00 pm) or 020 8424 0999 (after 5 pm).

19.3 On being notified of a complaint or suspicion of abuse, the DSL will:

- a. Operate safeguarding procedures in line with Harrow Safeguarding Strategic Partnership.
- b. Take into account the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to Children and Family Services and the police.
- c. Take into account the wishes or feelings of the pupil. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
- d. Take into account duties of confidentiality, so far as applicable.

19.4 If there is doubt over whether a referral should be made, the DSL will consult with Children and Family Services on a no-name basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to Children and Family Services will be made without delay (and in any event within 24 hours). If the initial referral is made by telephone, the DSL will confirm the referral in writing to Children and Family Services within 24 hours. Children and Family Services should make a decision within one working day of a referral being made about what course of action they are taking and should inform the referrer of the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed;

- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

19.5 If no response or acknowledgement is received within one working day, the DSL, or the referrer, should follow up on the referral.

19.6 The DSL will keep the Head informed of the case unless the complaint involves the Head in which case the Chair of Governors (or Vice Chair in his absence) will be consulted.

19.7 Staff must not investigate suspected abuse or any allegations against other staff themselves.

19.8 If the child's situation does not appear to be improving the DSL or the staff member with concerns should consider following local escalation procedures to ensure concerns have been addressed and that the child's situation improves.

19.9 Children in need:

A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

19.10 In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL will liaise with Children and Family Services and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary.

19.11 Children suffering or likely to suffer significant harm:

Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. Under section 31 (10) of the Children Act 2004, the question of whether harm suffered by a child is significant relates specifically to the child's health and development. Their health or development should be compared with that which could reasonably be expected of a similar child and the parenting that we would reasonably expect them to receive from their parent/carer.

19.12 All pupils identified as children in need or children suffering or likely to suffer significant harm will be provided with the appropriate levels of pastoral support led by a DSL in conjunction with Heads of Section, Heads of Year and form tutors.

20. Children potentially at greater risk of harm

20.1 Children who need a social worker (Child in Need and Child Protection Plans): Children may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

20.2 There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

20.3 Children requiring mental health support: Schools have an important role to play in supporting the mental health and wellbeing of pupils. For further information see 'Mental Health' on page 15.

21. Allegations of abuse made against staff, supply staff, Governors and volunteers

- 21.1 The School has procedures for dealing with allegations of abuse against staff, (including the Head), supply staff, Governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff, supply staff, Governors and volunteers from false or unfounded allegations. These procedures are set out in Appendix 1 and follow Part 4 of Keeping Children Safe in Education.
- 21.2 The School has clear procedures to manage and record low level concerns about staff; these are detailed in Appendix 7
- 21.3 Detailed guidance is given to staff, supply staff, Governors and volunteers to ensure their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in:
- The Code of Conduct for Staff which provides details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.
- 21.4 Staff, supply staff, Governors and volunteers should also feel able to follow the School's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School, potential failures by the School or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.
- 21.5 Where a member of staff feels unable to raise an issue within the School's whistleblowing procedures they may contact Harrow Multi-agency Safeguarding Hub (MASH) on 020 8901 2690. Staff can also contact the Government's Whistleblowing service via the NSPCC report line which is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call the NSPCC whistleblowing helpline on 0800 028 0285 (Mon-Fri 8am-8pm) or email: help@nspcc.org.uk

22. Child on Child abuse

- 22.1 All staff should be aware that children are capable of abusing their peers i.e. child on child abuse. Child on Child abuse is unacceptable and will be taken seriously by the School. It can manifest itself in many ways both inside and outside of school, and online. This is most likely to include, but may not be limited to:
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - Abuse in intimate personal relationships between peers;
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
 - Sexual violence (this may include an online element which facilitates, threatens and/or encourages sexual violence);
 - Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment;
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party;
 - Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
 - 'Upskirting' which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim; and
 - Initiation/hazing type violence and rituals (including activities involving harassment, abuse or

humiliation used as a way of initiating a person into a group and may include an online element.

- 22.2 All staff should understand, that even if there are no reports in their school it does not mean child-on-child abuse is not happening, it may be that it is just not being reported. It is important that if staff have any concerns regarding child-on-child abuse they should speak to the DSL or deputy DSL.
- 22.3 It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, even if it appears to be relatively innocuous, as this can be an important intervention that helps prevent problematic, abusive or violent behaviour in the future. Child-on-child abuse should not be tolerated or passed off as “just banter”, “part of growing up”, “boys being boys” or “just having a laugh”. Downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment and a culture that normalises abuse leading to children accepting it as normal and not reporting it. Staff should be aware that gender issues can be prevalent when dealing with this type of abuse i.e., that it is more likely that girls will be victims and boys perpetrators.
- 22.4 The threshold for dealing with such abuse is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Such abuse will be referred to local agencies.
- 22.5 The Personal, Social, Health and Economic (PSHE) education programme and the Relationships and Sex Education scheme(s) of work aim to enable pupils to lead responsible, healthy and assertive lives and to develop skills and knowledge which will equip them with the ability to deal with a range of issues. Lessons on healthy relationships, including bullying, are included throughout the PSHE programme. The unacceptable nature of all forms of bullying is introduced into form discussion, assemblies and into lessons where appropriate, e.g. drama improvisation. Middle School pupils work with their form tutors to agree a code of conduct which is displayed in each tutor room.
- 22.6 Pupils who have been subject to child-on-child abuse are encouraged to immediately report any concerns to any member of staff, whether their form tutors, teacher, support staff or speak directly to their Junior School Deputy Head or the Senior School Section Head or Head of Year. Alternatively, pupils may seek help from the School Counsellors and/or Medical Centre staff. If a pupil makes an allegation of child-on-child abuse staff should follow the procedure as set out under ‘What to do if a pupil makes a disclosure’ as seen from page 26. In response to reports of child sexual violence and/or sexual harassment the School will act in accordance with Part 5 of Keeping Children Safe in Education.
- 22.7 The School’s Digital Safety Policy for Pupils reminds pupils that the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), is strictly prohibited by the School and may constitute a criminal offence. The School will treat such incidences, both sending and receiving, as a safeguarding matter, and mobile phones may be confiscated and searched in appropriate circumstances (see the School's Behaviour Policy on the searching of electronic devices). Pupils have been advised to speak to any member of staff for advice if they are concerned about images that they have received, sent or forwarded.
- 22.8 When child-on-child abuse is found to have occurred appropriate action will be taken to support both the victims and perpetrators:
- Ensure the immediate safety and wellbeing of those involved
 - Provide on-going support and counselling for the victim, including support from external services where appropriate
 - Provide on-going support and counselling (where deemed necessary) for the perpetrator, including support from external services where appropriate
 - Consider the motivation behind the behaviour and establish whether further support and/or counselling, including support from external services, are required to rectify behaviour and tackle any

underlying issues which contributed to the behaviour

22.9 A pupil against whom an allegation of abuse has been made may be suspended from School during the investigation and the School's Behaviour Policy and Antibullying Strategy will apply.

22.10 The School will take advice from Children and Family Services on the investigation of such allegations, which give reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse, who are all treated as being "at risk". If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Children and Family Services, parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult.

23. Safer recruitment

23.1 The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance, and in accordance with the School's Recruitment, Selection and Disclosure Policy.

23.2 The School obtains Disclosure and Barring Service clearance for all staff and complies with guidance concerning the Childcare (Disqualification) Regulations 2018 and the Education Act 2006. The School conducts a number of checks including a prohibition from teaching check and prohibition from management (S.128 direction) check, where applicable, via the Teaching Regulation Agency.

23.3 Individuals who have lived or worked outside the UK undergo the same checks as all other staff, and further appropriate checks as set out in the Recruitment, Selection and Disclosure Policy and the Code of Conduct for Staff.

23.4 The School will ensure that assurance is obtained of appropriate child protection checks and procedures having been applied to any staff employed by another organisation and working with the School's pupils on another site.

23.5 The School will make a referral to the Disclosure and Barring Service (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) as soon as possible if the criteria are met, that is they have caused harm or pose a risk of harm to a child, in the cases listed below. In the case of a teacher, the case manager must consider whether to refer to the Teacher Regulation Agency.

- a. it is decided to dismiss a member of staff (including the Head) or to cease using the services of a governor, contractor, volunteer or student at the School because he or she is considered unsuitable to work with children (a settlement/compromise agreement will not be used); or
- b. a member of staff (including the Head), governor, contractor, volunteer, student or any other person at the school tenders his or her resignation, or ceases to provide his or her services, and child protection allegations had been made.

23.6 Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

23.7 The Disclosure and Barring Service is responsible for bringing together the services for the checking of criminal records and the barring of individuals deemed unsuitable to work with children or vulnerable adults.

- 23.8 Any such incidents will be followed by a review of the safeguarding procedures within the School with a report being presented to the Governors without delay.
- 23.9 The School complies with the Childcare (Disqualification) Regulations 2018 and the Education Act 2006. Staff connected to the School's Early Years and Later Years provisions are under an ongoing duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Recruitment, Selection and Disclosure Policy for further information about this duty. The guidance applies to all staff, supply staff and volunteers working in the School.
- 23.10 Where pupils are placed in Alternative Provision, the School will request written confirmation of completed safeguarding checks on staff, and that the provider will notify the School of any safeguarding concerns. Reviews of the placement will occur at least every half term, or earlier if a concern arises.
- 23.11 In line with paragraph 144 of KCSIE 2025, the School will take appropriate action to meet the Department for Education's Cyber Security Standards, to improve resilience to cyber threats

24. Secure School Premises

- 24.1 The School will take all practical steps to ensure that School premises are as secure as circumstances permit. Any third party using the school premises will have its own adequate safeguarding policies in place, which will be available to school and reviewed by the DSL. Third parties supervised by the school may have their own safeguarding policy, but will be obliged to follow the School's safeguarding procedures at all times.
- 24.2 A visitor's book is kept at Reception and all visitors are required to sign in on arrival and sign out on departure. All visitors will be given a name badge with the title "Visitor" which must be clearly displayed and worn at all times whilst on School premises. Visitors who are not required to undergo DBS checks must be escorted whilst on School premises by a member of staff or appropriately vetted volunteer. Visitors who have undergone requisite DBS checks are not required to be escorted whilst on School premises.
- 24.3 Contractors who are not required to undergo DBS checks will be issued with a visitor's badge and must be escorted at all times whilst on School premises. Contractors who have undergone requisite DBS checks will be issued with contractor's ID and are not required to be escorted whilst on School premises.
- 24.4 All staff are issued with identity badges displaying their name and photograph. The badges must be clearly displayed and worn at all times whilst on School premises.
- 24.5 If an individual or organisation using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities) raises a safeguarding allegation, the school will follow the safeguarding policies and procedures, including informing the LADO.

25. Safer use of technology & Online Safety

- 25.1 The School's Digital Safety Policies set out comprehensive guidance and advice to pupils, staff and all members of the School community. Pupils are taught online safety as part of a broad and balanced curriculum, which includes lessons on staying safe online as part of the PSHE programme.
- 25.2 In the Junior School all mobile phones are handed in to the form teacher at the beginning of the School day and collected at the end of the day. From September 2024 the Junior School will be smart phone free. In the Senior School pupils are not permitted to use their mobile phones during the school day, in lessons, during extracurricular activities or have their phones out in public spaces. In Year 7-11 pupils are required to store their mobile phone in their Yondr pouch.

25.3 The policy includes guidance on the use of electronic devices with imaging and sharing capabilities, including mobile phones and cameras in the EYFS setting. Guidance to parents and staff on use of cameras in school is also set out as follows:

- In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises.
- This also applies to staff who must not bring electronic devices with imaging and sharing capabilities, including mobile phones and cameras into the EYFS setting (classroom, bathrooms or designated play areas).
- Parents may bring electronic devices with imaging and sharing capabilities, including mobile phones and cameras onto the premises.
- The following announcement is made prior to whole school productions: “Good afternoon/evening ladies and gentlemen and welcome to this performance of [SHOW]. Please take this opportunity to ensure you phones are switched off or to silent for the duration of the show. May I also remind you that the taking of photos or video is strictly prohibited, for more information, please consult our safeguarding policy. In the event of an emergency, please leave by your nearest exit and follow guidance provide by staff. Thank you & enjoy the show”
- Parents are permitted to take photographs of their own child where they are performing solo or in small groups, but the overall message is that parents must be considerate when taking photographic images at School events. Flash photography must not be used during any performances in School.
- Parents are requested not to publish photographic images of other children in any public forum, or to ‘tag’ children from other families in images already published, without the permission of the relevant family. It is illegal to sell or distribute recordings from events without permission.
- Staff may bring electronic devices with imaging and sharing capabilities, including mobile phones and cameras onto the premises but should not take photographs of pupils on their personal devices. Staff should only use equipment provided or authorised by the School when taking photographs of pupils for official School purposes.

25.4 The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism; including misinformation, disinformation (e.g. conspiracy theories or misleading AI-generated content), fake news and other online harms.
- **contact:** being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images e.g., consensual and non- consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and,
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

25.5 The School will do all it reasonably can to limit pupils’ exposure to the above risks when using the School’s IT systems by having in place a filtering system to safeguard pupils from potentially harmful and inappropriate material online without “over blocking” or imposing unreasonable restrictions as to what pupils can be taught through online teaching.

25.6 The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place.

Mrs Nicola Dawson – Deputy Head (Pastoral) and DSL - is the named member of SLT responsible for the school's filtering and monitoring systems. Mrs Nina Kingsmill-Moore is the named Safeguarding Governor responsible for filtering and monitoring systems.

- 25.7 Online safety training will be part of the annual Safeguarding and Child Protection training for all school staff and will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- 25.8 The Designated Safeguarding Lead will regularly review with the Support department the websites available to staff and student and which websites might be blocked by the School's monitoring software. The Designated Safeguarding Lead receives email alerts relating to filtering and monitoring software (relating to all network users) outlined in para 25.8 and has access to the School's filtering and monitoring to be able to ascertain risk and note possible trends. The Senior Team and Governing Body Pastoral Sub-Committee review annually online safety in their annual safeguarding and pastoral review.
- 25.9 In relation to the [DfE filtering and monitoring standards](#), the School has software installed that monitors all PCs and school devices for key words and phrases. All software used on the PC/laptop or device is monitored by keyboard strokes not just internet browsing. In the event of a key word or phrase being used the user, date, time and context are logged. The list of key words and phrases can be amended and different actions taken depending on the severity. For example, low risk – the event is logged, medium risk – the event is logged and an alert is generated in the software console, high risk - the event is logged, a screen shot taken, an alert is generated, and an email is sent to the DSL who will take appropriate action.
- 25.10 The DSL will work with the IT team to ensure that any filtering and monitoring systems, including those incorporating or managing access to Generative AI technologies, meet the DfE's product safety expectations (Jan 2025). This includes preventing harmful content access, maintaining activity logs, security against malicious use, and prioritising transparency and child safety.
- 25.11 Staff must not give their personal contact details including personal e-mail addresses, home or mobile telephone numbers etc. to pupils. Staff must not have personal contact details for pupils on their personal phones. Staff must abide by the following rules regarding contact with recent former pupils:
- After the first year, staff can accept former pupils' requests to connect on LinkedIn (but no other social media platforms), though they should not feel obliged to do so;
 - Staff can exchange emails with former pupils about legitimate subjects such as School, university or career ideas, via School email only;
 - correspondence should usually be initiated by the ONL rather than by the staff member, unless they have legitimate cause to contact the pupil for school business.

Correspondence must always remain professional and proportionate to the aims. These are likely to be to conduct school business or for the ONL to update the staff member about her progress after NLCS. In the latter case, staff members should not enter into lengthy or frequent correspondence with the ONL and must keep their correspondence professional. The acid test would be whether a staff member would be happy to show their correspondence to a colleague. All correspondence between staff members and ONLs must be conducted on school email addresses or platforms until the ONL turns 22 or graduates from university. The above rules remain in place until former pupils graduate, or turn 22 if not attending university.

- 25.12 Staff should be aware that the School's filtering monitoring software is effective on school devices both inside and outside of school. School's expectation is that use of a staff member's school device should be predominantly for schoolwork rather than for personal use. When a device is being used for personal purposes, professional standards are demanded at all times. School reserves the right to discuss a member

of staff's activity on a school device, both inside and outside of school, with them.

25.13 Pupils are responsible for their actions, conduct and behaviour on the internet, mobile and smart technology. Their use of technology must be safe, secure, responsible and legal. Secure Wi-Fi access is provided in and around the School grounds and pupils are encouraged to connect to the internet whilst on School premises using the 'Student' wireless network. The School is aware that many pupils have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G), and that this access means some pupils may use this technology inappropriately to bully or harass other pupils, or to view or share inappropriate material, whilst at School. Pupils must abide by the School's Behaviour Policy and Anti-bullying Strategy.

25.14 If a pupil is aware of or experiences misuse, harassment, bullying or abuse, via mobile or smart technology by other pupils, they should immediately talk to a member of staff. Where a pupil breaches any of the School rules, practices or procedures the Head, Head of the Junior School, or Deputy Head (Pastoral) will apply sanctions that are appropriate and proportionate to the breach including, in the most serious cases, those in line with the School's Behaviour Policy.

26. Use of Pupils' Images and Names

NLCS is committed to protecting its students by implementing robust safeguarding measures regarding online imagery. A combination of consent-based policies, technological protections, staff training, and ongoing monitoring will ensure that student images are used responsibly while mitigating risks associated with AI-assisted deepfake manipulation and other forms of misuse.

26.1 Despite the risks, North London Collegiate School (the School) believes that the responsible use of photographic images and names makes a valuable contribution to the School community. This can increase pupil motivation, morale and help the School community to celebrate the School's achievements.

26.2 It is important to note that data protection law is unlikely to apply in many cases where photographic images are taken in schools. If photographs are taken purely for personal use, such as by parents at a sports day for the family photo album, they will not be covered by data protection legislation.

26.3 For the purposes of this policy, the words "photographic images" includes still or moving images, with or without sound, and whether stored/transmitted electronically or as hard copies.

26.4 This policy aims to provide clear information to parents and pupils about how images and names of pupils are usually used by the School, and guidance to taking and using photographic images on School premises by parents, pupils and external organisations.

This policy also aims to deal with the complex issues surrounding AI generated issues, including AI-assisted 'deepfake' images of children, including providing guidance to students, staff and parents about how not to fall foul of any criminal activity.

26.5 The School seeks written consent from parents before using photographic images of pupils. Where the School seeks consent to use personal data the option will be provided to withdraw this consent at any time. Any use of information before consent is withdrawn remains valid.

26.6 Parents are responsible for providing or withdrawing consent for their child/ren, in writing, via the Parent Portal. However, parents should be aware that, in some circumstances, the law recognises pupils' own rights to have a say in how their personal information is used.

26.7 Guidance for school

26.7.1 The School uses photographic images of pupils, individually or collectively, for many purposes including but not limited to; record keeping, educational use, on the School website, in the School prospectus, internal displays etc.

Image consent forms are issued to parents annually via the Parent Portal. Consent forms explicitly address AI and online vulnerability.

Additional permissions may be sought for materials outside of the school's owned channels (e.g new school film or advertising)

26.7.2 All School staff must adhere to the School's guidelines on taking, storing and using images of pupils as set out in the School's Code of Conduct for Staff, Safeguarding and Child Protection policy and Data Protection policy.

26.7.3 Where the School publishes photographic images of pupils the School will refer to pupils only by their first names. Where the School publishes a programme for a School event such as a concert or a play the School will use names and surnames but without photographs.

The school will take the following measures to protect the identity of NLCS students:

- Reduction in the use of close-up, individual portraits of pupils on publicly accessible platforms.
- Prioritise group shots, action-based imagery, or silhouette/back-of-head shots in external communications.
- Avoid publishing images that include school badges, name tags, or specific locations that could facilitate pupil identification.
- Subtle watermarks (e.g., NLCS logo or copyright notice) on all images
- Disabling of right-click saving and use of CSS overlays to prevent direct downloads
- Where appropriate, adopt image blurring or pixelation of younger children in publicly available photos
- Avoidance of posting identifiable pupil images on public-facing social media accounts unless essential.
- Restriction of image distribution to school-approved channels only
- Avoidance of real-time location details in online posts
- Reinforcement of best practices through the Staff Handbook and Staff training, including guidance for reporting concerns via the School's Low Level Concern Microsoft Office Form
- Routine reviews of website and social media content to ensure compliance with safeguarding policies

26.7.4 The School may hire professional photographers to take photographic images of pupils for marketing purposes. External photographers are requested to act in accordance with the School's instructions regarding taking and storing photographic images, and will always be accompanied by a member of staff whilst they are on School premises.

26.7.5 On occasion, the School may invite the media to take photographic images of pupils to celebrate successful pupil performances in exams, sports, productions etc. If the media requests full names to accompany photographic images, the School will seek prior consent from parents before disclosing this information.

26.8 Guidance for pupils

26.8.1 The Senior School and Lower School Pupil Digital Safety Agreements', located in the School's Digital Safety Policy for Pupils, sets out the responsible behaviour expected in relation to photographic images.

26.8.2 All pupils are encouraged to be sensitive in their use of photographic images of their peers, and to report any misuse or concerns to their class teacher/form tutor.

26.8.3 Using photographic material of any kind to abuse, bully, harass or upset or intimidate others will not be tolerated and will constitute a serious breach of discipline.

26.9 Guidance for parents

26.9.1 The following announcement is made prior to whole school productions: “Good afternoon / evening ladies and gentlemen and welcome to this performance of [SHOW]. Please take this opportunity to ensure you phones are switched off or to silent for the duration of the show. May I also remind you that the taking of photos or video is strictly prohibited, for more information, please consult our safeguarding policy. In the event of an emergency, please leave by your nearest exit and follow guidance provide by staff. Thank you & enjoy the show”

26.9.2 Parents are permitted to take photographs of their own child where they are performing solo or in small groups, but the overall message is that parents must be considerate when taking photographic images at School events. Flash photography must not be used during any performances in School.

26.9.3 Parents are requested not to publish photographic images of other children in any public forum, or to ‘tag’ children from other families in images already published, without the permission of the relevant family. It is illegal to sell or distribute recordings from events without permission.

26.10 Security

26.10.1 All pupils are photographed upon entry to the School for internal identification purposes, and again at Years 7, 9 and 12. The photographs identify the pupil by name and form group, and are saved on the School’s database system which is accessible to staff.

26.10.2 The School uses CCTV on its premises. Pupil images will be captured on this system and are used in accordance with the School’s Data Protection policy and Privacy Notices. CCTV is not used in private areas such as changing rooms and washroom facilities but is located in some teaching / form rooms. The school reserves the right to use CCTV footage to assist in any internal investigations.

26.11 Copyright

26.11.1 The School does not own the copyright of all photographic images and therefore cannot control how these are used.

26.11.2 The School will only work with reputable external photographers to minimise the risk of misuse of photographic images.

26.11.3 The School is unable to control the use of photographic images taken by parents.

27. **Visiting speakers**

27.1 The School has a policy in place setting out the steps members of staff should take prior to hosting a visiting speaker and during the visit. The School will assess the visiting speaker’s suitability by conducting appropriate vetting checks, as set out in the policy, and will ensure that visiting speakers, whether invited by staff or pupils, are suitable and appropriately supervised. A register of all visiting speakers is

maintained on a database or where applicable, on the Single Central Register, and hard copies of the results of the vetting checks are retained in a central folder.

28. Training

- 28.1 All training will be carried out in accordance with the Harrow Strategic Safeguarding Partnership requirements.
- 28.2 The DSL attends child protection training courses (also appropriate to our EYFS setting) and training on inter-agency working at least every two years in keeping with Annex B of Keeping Children Safe in Education. The DSL also completes annual Prevent awareness training.
- 28.3 All staff, including temporary staff and volunteers, will be provided with the following in their induction training:
- (a) this policy (which includes our procedure for Children Missing in Education)
 - (b) the Code of Conduct for Staff
 - (c) the Whistleblowing Policy
 - (d) the Missing Pupil Policy
 - (e) the Behaviour Policy
 - (f) Guidance regarding online safety
 - (g) Wellbeing Policy
 - (h) the role, identity and contact details of the DSLs
 - (i) a copy of Part 1 and Annex B of Keeping Children Safe in Education
 - (j) Digital Safety Policy for Staff
- 28.4 The purpose of this induction training will be to ensure that staff understand the School's safeguarding policies and that they have an up to date knowledge of safeguarding issues. This will include, amongst other content, training to enable staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way.
- 28.5 All staff, including the Head, receive a copy of Keeping Children Safe in Education. Staff are required to complete declarations confirming they have received, read and understood the above and this policy.
- 28.6 The School will ensure that all Governors receive appropriate safeguarding and child protection training at induction which will equip them with the knowledge to test and assure themselves that the safeguarding policies and procedures in place at the School are effective and supports the delivery of a robust whole school approach to safeguarding.
- 28.7 At least every two years, the DSL will ensure that the Head, all staff members and the Board of Governors, including the nominated Governor, undertakes child protection training appropriate to their roles which will be updated regularly in accordance with the Harrow Strategic Safeguarding Partnership requirements. The purpose of this training will be to ensure that staff understand the School's safeguarding policies, and in particular, the Safeguarding and Child Protection policy, and that they have an up to date knowledge of safeguarding issues. This will include, amongst other content, training to enable staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way.
- 28.8 Whenever such training takes place, in consultation with Harrow Strategic Safeguarding Partnership, the School will discuss and take account of any specific local requirements and the context of the School which needs to be taken account of in the training.

28.9 The School undertakes to make all supply staff, part time staff and volunteers aware of the training to ensure their attendance. The DSL run safeguarding and child protection training sessions throughout the academic year to ensure all staff receive the requisite training. Staff also receive safeguarding and child protection updates via email and staff briefings, as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. Safeguarding training also includes Prevent training and guidance relating to online safety.

28.10 The Head and Senior Team (including the DSL) will monitor and evaluate with Governors the effectiveness of the safeguarding training provided to staff. The safeguarding training will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require).

28.11 The safeguarding training will also be subject to critical review by the Chair of the Governors' Pastoral, Safeguarding and Compliance Committee, who has received safeguarding training, and by the full Governing Body each year as part of the Governors' annual safeguarding review.

29. Confidentiality and information sharing

29.1 The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. Records will be securely disposed of in line with the suggested retention periods as set out in the School's Data Retention Policy. The School will co-operate with police and Children and Family Services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children.

29.2 The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. The School will not allow data sharing concerns to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

29.3 Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner's Office](#) (ICO), which includes ICO UK GDPR FAQs and guidance from the department
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

29.4 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult, Children and Family Services, the police and/or the Head before discussing details with parents.

29.5 Allegations against staff, the Head, volunteers supply staff or Governors will be dealt with in accordance with the procedures set out in Appendix 1 below. In addition to informing the LADO, the Head (or the Chair of Governors, in cases where an allegation relates to the Head) will consult, where appropriate, with the police and Children and Family Services to agree the information that should be disclosed and to whom.

30. Children who are lesbian, gay, bi, or trans (LGBT)

30.1 A child or a young person who may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

30.2 Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for pupils to speak out or share their concerns with members of staff.

30.3 KCSiE now specifies 'outing' a student without their consent as a specific safeguarding risk

30.4 Staff must maintain confidentiality and share only where there's a clear safeguarding need (fine to log on CPOMS under confidential if you have any concerns)

31 Monitoring and review

31.1 Any child protection incidents arising from any failures in safeguarding policy or its execution at the School will be followed by a review of the safeguarding procedures within the School by the DSL and a prompt report to the Governors. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

31.2 The Safeguarding and Child Protection Policy will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require) by the Head and Senior Team.

31.3 The Safeguarding and Child Protection Policy will also be subject to critical review by the Chair of the Pastoral, Safeguarding and Compliance Committee, who has received safeguarding training, on an annual basis, the outcome of which will be reported to the full Governing Body.

31.4 The full Governing Body will annually review this policy and the implementation of its procedures, including good cooperation with local agencies, and approve the amendments to the policy, which will, in turn, be signed off by the Chair of Governors. This annual review will take account of evidence such as staff training in safeguarding matters, referral data, analysis of any issues and themes which have emerged in the School and how these have been handled, initiatives to educate pupils about safeguarding, and details of any contribution the School has made to local discussions and multiagency working on safeguarding matters. The annual review will be conducted in conjunction with the Head and Senior Team (including the DSL).

31.5 The date of the next review is shown on the front page.

Appendix 1: Allegations of abuse against members of staff, the Head, Governors/Directors, contractors, volunteers, supply staff or students who work with children

Any allegation against a member of staff (or any volunteers, supply staff, contractors or students who work with children, including those in the EYFS setting), or the Head or a Governor/Director must be reported straight away, in accordance with the procedures set out below.

The School has procedures for dealing with allegations that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures will be used where the member of staff, volunteer, supply staff, student, the Head or Governor/Director has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children.

Any allegations not meeting this criteria will be dealt with in accordance with the Harrow Strategic Safeguarding Partnership procedures and paragraphs 406 to 412 of Keeping Children Safe in Education (September 2021): 'Concerns that do not meet the harms threshold'. Advice from the LADO will be sought in borderline cases.

All such allegations must be dealt with as a priority, without delay.

The School has a culture of safety and of raising concerns, encouraging transparency and accountability. Induction and whole school training in safeguarding includes guidance to staff on the raising and handling of concerns and the support available in such cases.

Reporting allegations against members of staff, the Head, DSL, Governors/Directors, contractors, volunteers, supply staff or students who work with children

Where an allegation or complaint is made against any member of staff (other than the Head), the DSL, a Governor/Director, contractor, volunteer, supply staff or students who work with children, the matter must be reported immediately to the Head (or in the Head's absence, the Chair of Governors). The Head can be reached by calling the Head's PA on 0208 951 6401 (making clear it is an urgent staff matter).

Where appropriate to do so, the Head will liaise with the DSL, the Chair of Governors, or the Vice-Chair in his absence.

Where an allegation is made against the Head, the matter must be reported immediately to the Chair of Governors, or the Vice-Chair in their absence, without notifying the Head first. Staff can access the Chair of Governors and the Vice-Chair's contact details directly through SharePoint or via Microsoft Teams: *All Staff/General/Safeguarding/Safeguarding Governors' Contact Information*. The contact details are also set out on the safeguarding prompt card issued to all staff. Parents can write to the Chair of Governors or the Vice-Chair, at the School address, marking their envelope 'Private & Confidential'. The Chair of Governors, or Vice-Chair in their absence, will immediately report the matter to the Local Authority Designated Officer without notifying the Head first.

The Head or Chair of Governors (or Vice Chair), as appropriate, will report the matter to the Local Authority Designated Officer, Harrow at 020 8901 2690 (Office hours), 020 8424 0999 (Emergency Duty Team for emergencies when the office is closed), and will act in accordance with any strategy formulated by the relevant agencies. All allegations will be discussed with the Local Authority Designated Officer before further action is

taken. The discussions will be recorded in writing, and any communication with both the accused person and the parents of the child agreed. The Local Authority Designated Officer will be informed of allegations that come to the attention of the School, or that are made directly to the police within one working day.

If it is not possible to report to the Head or Chair of Governors in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Governors.

The person with responsibility for contacting the Local Authority Designated Officer in accordance with the procedures described above is known as the "case manager".

Disclosure of information:

The case manager will inform the accused person of the allegation as soon as possible after the Local Authority Designated Officer has been consulted. The parents or carers of the child(ren) involved will be informed of the allegation as soon as possible after the Local Authority Designated Officer has been consulted, if they do not already know of it. Where the Local Authority Designated Officer advises that a strategy discussion is needed, or the police or Children and Family Services need to be involved, the case manager should not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed. The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

Further action:

The School has a duty of care towards its employees and as such, it will ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part Four of Keeping Children Safe in Education.

Suspension:

The School will carefully consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- a. there is cause to suspect a child or other children at the School is or are at risk of significant harm; or
- b. the allegation is so serious that it might be grounds for dismissal.

All alternatives to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School.

The School will give due weight to the views of the Local Authority Designated Officer, Keeping Children Safe in Education and Working Together to Safeguard Children when making a decision about suspension. A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided.

Ceasing to use staff:

If the School ceases to use the services of a member of staff (including the Head), or a Governor, volunteer, supply staff, contractor or student who works with children, because he or she is unsuitable to work with children, a settlement/ compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Where a referral is made to the DBS, (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) a separate referral will also be made as soon as possible to the Teaching

Regulation Agency in cases of serious professional misconduct of teachers. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

Resignation:

If a member of staff (including the Head) or a Governor/Director, volunteer, supply staff, or contractor tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) as soon as possible if the criteria are met, that is, they have caused harm or pose a risk of harm to a child, and a separate referral will also be made as soon as possible to the Teaching Regulation Agency in cases of serious professional misconduct of teachers.

Ceasing to use a person's services includes:

Dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

Where a teacher (including the Head) has been dismissed, or would have been dismissed had he/she not resigned, in circumstances where the threshold for a DBS referral have not been met, separate consideration will be given to whether the matter should be referred to the Teaching Regulation Agency. This will include matters where there has been unacceptable professional conduct, conduct which may bring the teaching profession into disrepute, conviction at any time of a relevant offence or where a prohibition order may otherwise be appropriate.

Unsubstantiated, false or malicious allegations:

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's Behaviour Policy.

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

Allegations against a teacher who is no longer teaching and/or allegations of historical abuse should be reported to the DSL who will take them forward in accordance with the guidance contained in Keeping Children Safe in Education.

Record keeping:

Details of all allegations will be recorded on the employee's file and retained at least until the employee reaches the normal pension age or for a period of 75 years from the date of the allegation, if this is longer. Allegations proven to be false, unsubstantiated or malicious, will not be referred to in any employer reference. Allegations found to be malicious will be removed from personnel records.

Appendix 2: Responsibilities of the Governing Body in the Management of Safeguarding

The Governing Body will ensure that it and, as appropriate, the School's Senior team and all staff comply with all requirements outlined in Part two of Keeping Children Safe in Education, including that:

- There are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This includes effective safer recruitment policies which are in place and embedded.
- There is an effective Safeguarding and Child Protection Policy and procedures in place, together with a Code of Conduct for Staff, which amongst other things includes acceptable use of technologies, staff/pupil relationships and communications including the use of social media, and that these are provided to all staff (including, as and where necessary, to temporary staff and volunteers, based on a proportional risk based approach) on induction;
- The DSL is appointed from the Senior Team and that they have the appropriate authority and the time, funding, training, resources and support to fulfil the role and responsibilities as outlined in pages 23-26;
- The School contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children through effective implementation of the Safeguarding and Child Protection Policy and procedures and good cooperation with local agencies;
- The School's safeguarding arrangements are in line with locally agreed inter-agency procedures and practice set up by Harrow Strategic Safeguarding Partnership;
- The Governing Body has nominated one of its members (board level lead) as the 'Nominated Safeguarding Governor' for the School to have oversight of child protection matters, including monitoring of the School's legal duty to refer to the Disclosure and Barring Service; liaise with the local authority and/or partner agencies on issues of child protection; and instigate and oversee the annual review of this policy.
- The School has statutorily compliant procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head.
- The School has sufficient systems and software in place to ensure appropriate filtering and monitoring of all network users.
- The School has an appropriate behaviour policy in place.
- The School also has procedures in place to handle allegations against other children.
- The School operates an effective training strategy that ensures all staff, including the Head, receive safeguarding and child protection training, as and when required (at least annually) in accordance with Harrow Strategic Safeguarding Partnership guidance.
- An annual review of safeguarding is instigated, carried out and approved and that the minutes of Governing Body meetings record in detail the relevant discussion and actions taken in carrying out and approving their annual review of safeguarding.
- Appropriate safeguarding responses are in place to deal with pupils who go missing from the School (see Missing Pupil Policy), in particular any pupils who go missing on repeat occasions to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

- Any serious incident that has resulted or could result in a significant loss of funds or a significant risk to the School's property, work, beneficiaries or reputation is reported to the Charity Commission immediately, including any suspicions, allegations or incidents of abuse or mistreatment of vulnerable beneficiaries.

Appendix 3: Responsibilities of the Head in the Management of Safeguarding

- Ensure that the Safeguarding and Child Protection Policy and procedures adopted by the Governing Body are implemented and followed by all staff.
- Allocate sufficient time and resources to enable the DSL and deputies to carry out their roles effectively.
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace will be dealt with in accordance with the School's Whistleblowing procedures, disciplinary procedures, and/or the procedures set out in this policy as appropriate.
- Ensure that children's safety and welfare is addressed through the curriculum.
- Receives the required safeguarding and child protection training and training in order to understand safer recruitment procedures and processes, and be able to apply them as a member of an appointment panel and to deal with allegations made against members of staff and volunteers.

Appendix 4: Protecting children from child-on-child sexual abuse

The following information is from the NSPCC website:

<https://learning.nspcc.org.uk/news/2021/april/sexual-abuse-in-education-helpline/launched>

Child-on-child sexual abuse is sexual abuse that happens between children of a similar age or stage of development. It can happen between any number of children, and can affect any age group.

It can be harmful to the children who display it as well as those who experience it. Children can experience child-on-child sexual abuse in a wide range of settings, including:

- at school
- at home or in someone else's home
- in public spaces
- online

It can take place in spaces which are supervised or unsupervised. Within a school context, for example, child-on-child sexual abuse might take place in spaces such as toilets, the playground, corridors and when children are walking home (Contextual Safeguarding Network, 2020).

Recognising child-on-child sexual abuse

It can be difficult to work out if a child is displaying appropriate, inappropriate, problematic or abusive sexual behaviour.

Examples of sexually abusive behaviour may include:

- inappropriate or unwanted sexualised touching
- pressurising, forcing or coercing others to perform or take part in sexual acts
- pressuring, forcing or coercing someone to share nude images (sexting)
- sharing sexual images of a person without their consent
- taking a picture under a person's clothing, without their consent (upskirting)
- sexual harassment
- sexual or sexist name calling (Contextual Safeguarding Network, 2020).

Signs that a child has experienced child-on-child sexual abuse

Indicators that a child has experienced child-on-child sexual abuse may be physical or behavioural. A child or young person may appear withdrawn, frightened or begin to act differently from usual. They may also display physical signs such as noticeable discomfort in their genital or anal area.

Barriers to disclosure

Children do not always feel able to speak out about their experiences of child-on-child sexual abuse.

They may be afraid of:

- being considered a 'snitch'
- getting in trouble themselves
- how they will be perceived by others
- teachers or other adults not being discrete
- their parents being informed (Contextual Safeguarding Network, 2020).
- If a child is unsure about whether or not they have been sexually abused, they might be worried about causing a fuss or getting someone else in trouble for 'no reason'.

Children's understanding of child-on-child sexual abuse

Children may not always understand that they have experienced or carried out child-on-child sexual abuse. This might be because:

- they don't understand what constitutes appropriate, inappropriate, problematic or abusive sexualised behaviour
- they have experienced sexual abuse themselves and don't realise that what happened to them was wrong
- they don't know whether consent was given
- the abuse happened between friends or partners
- the abuse took place online
- they blame themselves for the abuse they received
- younger children lack knowledge of sex and sexuality as they are less likely to have received any relationships and sex education (NSPCC, 2018)

Responding to child-on-child sexual abuse

If a child experiences child-on-child sexual abuse or there are concerns a child might be displaying harmful sexual behaviour (HSB), you need to take child protection action.

Reporting

If you think a child is in immediate danger, contact the police on **999**. If you're worried about a child but they are not in immediate danger, you should share your concerns.

- **Follow the School's child protection procedures**, including immediately sharing concerns with the DSL or deputy DSLs.
- **Report to the police as appropriate** (for example, if an allegation of rape, sexual assault or sexual offence is made). This should happen alongside making a referral to children's social care, following local authority guidelines.
- **Contact the NSPCC Helpline** on 0808 800 5000 or by emailing help@nspcc.org.uk where trained professionals will talk through your concerns with you and give you expert advice.
- **Contact Harrow Children and Family services** (see page 5 for contact details).
- **Contact the Report Abuse in Education Helpline** on 0800 136 663 or by emailing help@nspcc.org.uk.

Report Abuse in Education Helpline

The Department for Education commissioned the NSPCC to launch a new helpline. The helpline will provide support to:

- children and young people who want to share current and non-recent experiences of sexual abuse and harassment
- children and young people who want to talk about being involved in or witnessing any incidents
- anyone who works or volunteers in a school setting and needs support and guidance
- adults who have experienced non-recent abuse
- parents and carers who are concerned about their own child or other children. Calls to the helpline are free.

Protecting all the children involved

The duty to safeguard the child who has experienced abuse with the need to support the child who has displayed harmful sexual behaviour has to be balanced.

Children who witnessed the abuse or are friends of those involved may also be affected and need support.

Each incident of or concern about child-on-child abuse will be different: you should gather all the facts, assess any risks and make decisions on a case-by-case basis. This will help you understand who needs to be involved to make sure all children are appropriately protected and supported.

Any child who has experienced or been involved in sexual abuse in a school setting can contact NSPCC's [Report Abuse in Education Helpline](#) on 0800 136 663 or by emailing help@nspcc.org.uk.

Supporting the child who has experienced abuse

Every child who has experienced abuse should receive tailored support to meet their needs. There are things you can do to help make them feel safe and supported.

- Listen carefully to the child and reassure them that you are taking them seriously.
- Record the incident, noting all the relevant facts as fully as possible. Write down the language used by the child. This will help you record precisely what happened and understand how the child has been affected.
- Consider what support the child may need in the short-term, for example making sure they won't come into contact with the child who has displayed abusive behaviour.
- Consider what long-term support the child may need to help them recover from the trauma of what they have experienced. This may include therapeutic support.
- Understand the child's support network and consider what help they need to protect and care for the child.
- Include the child in any decisions that affect them.

Multi-agency responses

The DSL and/or their deputies will work with relevant agencies to protect and support all the children involved in an incident of child-on-child sexual abuse. This includes children's social care and the police if necessary.

Helping children speak out

Children might not feel able to talk to adults about child-on-child sexual abuse but there are things the School can do to make it easier:

- Children may feel more confident speaking out if they have a positive, trusting relationship with a trusted adult. This can be done by encouraging them to share their thoughts and opinions, responding to their concerns, and respecting and listening to them.
- If children can see a culture within the School that challenges inappropriate behaviour, they may feel more confident that any concerns they raise will be responded to appropriately.
- Having specialist staff in pastoral care or counselling roles can make it easier for children to share their concerns.

Talking with children about abuse and harassment

It's important to talk with children and young people about child-on-child sexual abuse.

In schools, lessons on relationships, sex and sexuality are a good way of helping children learn about topics such as appropriate sexual behaviour, trust, consent, boundaries and responsibility – see the School's Relationships and Sex Education Policy and PSHE Policy.

Appendix 5: Sharing nudes and semi-nudes: how to respond to an incident (overview)

This appendix provides a brief overview for staff of how to respond to incidents where nudes and semi-nudes have been shared by pupils.

What do we mean by sharing nudes and semi-nudes?

The UK Council for Internet Safety (UKCIS) defines this as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

Report it to your Designated Safeguarding Lead (DSL) or deputy DSL immediately.

Never view, copy, print, share, store or save the imagery yourself, or ask the pupil(s) to share or download – **this is illegal.**

If you have already viewed the imagery by accident (e.g. if a pupil has showed it to you before you could ask them not to), report this to the DSL (or deputy DSL) and seek support.

Do not delete the imagery or ask the pupil(s) to delete it.

Do not ask the pupil(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or deputy DSL.

Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame the pupil(s) involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL or deputy DSL.

UK Council for Internet Safety (December 2020)

Appendix 6: Advice and Support regarding specific forms of abuse and safeguarding issues

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2	DfE advice
	Domestic abuse: Various Information/Guidance https://www.gov.uk/domestic-violence-and-abuse	Home Office
	Domestic abuse https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/	NSPCC
	Domestic abuse http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/	Refuge
	Domestic abuse http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse	Safelives charity
	Faith based abuse: National Action Plan https://www.gov.uk/government/publications/national-actionplan-to-tackle-child-abuse-linked-to-faith-or-belief	DfE advice
Bullying	Relationship abuse: disrespect nobody https://www.disrespectnobody.co.uk/relationship-abuse/whatis-relationship-abuse/	Home Office website
	Child Sexual Violence and Harrassment Lucy Faithfull Foundation's 'Shore Space' service for young people concerned about sexual thoughts or behaviour. Lucy Faithfull Foundation	KCSIE advice
Bullying	Preventing bullying including cyberbullying https://www.gov.uk/government/publications/preventing-and-tackling-bullying	DfE advice
Children and the courts	Advice for 5-11-year olds witnesses in criminal courts http://formfinder.hmctsformfinder.justice.gov.uk/ywp-5-11eng.pdf	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts http://formfinder.hmctsformfinder.justice.gov.uk/ywp-12-17eng.pdf	MoJ advice

Children missing from education, home or care	Children missing education https://www.gov.uk/government/publications/childrenmissing-education	DfE statutory guidance
	Child missing from home or care https://www.gov.uk/government/publications/children-whorun-away-or-go-missing-from-home-or-care	DfE statutory guidance
	Children and adults missing strategy https://www.gov.uk/government/publications/missingchildren-and-adults-strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders https://www.nicco.org.uk/	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults https://www.gov.uk/government/publications/criminalexploitation-of-children-and-vulnerable-adults-county-lines	Home Office Guidance
	County Lines Toolkit For Professionals	The Children's Society in partnership with Victim Support And National Police Chiefs' Council
	Child sexual exploitation: guide for practitioners https://www.gov.uk/government/publications/criminalexploitation-of-children-and-vulnerable-adults-county-lines	DfE
	Trafficking: safeguarding children https://www.gov.uk/government/publications/safeguardingchildren-who-may-have-been-trafficked-practice-guidance	DfE and HO guidance
Contextual Safeguarding	Information for practitioners https://contextualsafeguarding.org.uk/	Contextual Safeguarding Network
Drugs	Drugs: advice for schools https://www.gov.uk/government/publications/drugs-advicefor-schools	DfE and ACPO advice
	Drug strategy 2017 https://www.gov.uk/government/publications/drug-strategy2017	Home Office strategy

	Information and advice on drugs http://www.talktofrank.com/	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention http://mentor-adepis.org/	Website developed by Mentor UK
Abuse or Safeguarding issue	Link to Guidance/Advice	Source
“Honour Based Abuse” (so called)	Female genital mutilation: information and resources https://www.gov.uk/government/collections/female-genital-mutilation	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation	
	Forced marriage: information and practice guidelines https://www.gov.uk/forced-marriage	Foreign Commonwealth Office and Home Office
	The right to choose: government guidance on forced marriage https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage	GOV.UK
Health and Wellbeing	Fabricated or induced illness: safeguarding children https://www.gov.uk/government/publications/safeguardingchildren-in-whom-illness-is-fabricated-or-induced	DfE, Department for Health and Home Office
	Positive health, wellbeing and resilience among young people https://www.gov.uk/government/publications/promotingchildren-and-young-peoples-emotional-health-and-wellbeing	Public Health England
	Rise Above: Free PSHE resources on health, wellbeing and resilience https://www.pshe-association.org.uk/curriculum-andresources/resources/rise-above-schools-teaching-resources	Public Health England
	Medical conditions: supporting pupils at school https://www.gov.uk/government/publications/supportingpupils-at-school-with-medical-conditions--3	DfE statutory guidance
	Mental health and behaviour https://www.gov.uk/government/publications/mental-healthand-behaviour-in-schools--2	DfE advice

Homelessness	Homelessness: How local authorities should exercise their functions https://www.gov.uk/guidance/homelessness-code-of-guidancefor-local-authorities	HCLG
Online	Sexting: responding to incidents and safeguarding children https://www.gov.uk/government/groups/uk-council-for-childinternet-safety-ukccis	UK Council for Child Internet Safety
	Remove a nude image shared online https://www.childline.org.uk/info-advice/bullying-abusesafety/online-mobile-safety/remove-nude-image-sharedonline/	Childline
	Toolkit to address the issue of online sexual harassment amongst young people aged 13-17 years https://www.childnet.com/resources/step-up-speak-up	Childnet International
	Advice on online safety https://www.thinkuknow.co.uk/	National Crime Agency & Child Exploitation and Online Protection
	Advice on healthy relationships, including sexting and pornography https://www.disrespectnobody.co.uk/relationship-abuse/whatis-relationship-abuse/	Home Office
	Advice on safe and responsible use of technology https://www.saferinternet.org.uk/	UK Safer Internet Centre
	Supporting technology in education https://swgfl.org.uk/	SWGFL charity
	Help for parents on how to keep their children safe online https://www.internetmatters.org/	Internet matters (not for profit)
	Help for parents on how to keep their children safe online https://parentzone.org.uk/	Parent Zone (social enterprise)
	Guidance for schools on cyberbullying https://www.childnet.com/resources/cyberbullying-guidancefor-schools	Childnet International
	Guidance and teaching resources covering online safety https://www.pshe-association.org.uk/	PSHE Association
	Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation https://educateagainsthate.com/	DfE and Home Office

	A briefing note for schools on how social media is used to encourage travel to Syria and Iraq https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation	GOV.UK
	Advice on internet safety https://www.gov.uk/government/organisations/uk-council-for-internet-safety	UK Council for Internet Safety
	Advice for schools and colleges https://learning.nspcc.org.uk/research-resources/schools/esafety-for-schools/	NSPCC
	Advice for parents https://www.net-aware.org.uk/	NSPCC
	Independent reviews, age ratings and other information about all types of media for children and their parents https://www.common sense media.org/	Common Sense Media
	Guidance to schools searching children in schools and confiscating items such as mobile phones https://www.gov.uk/government/publications/searching-screening-and-confiscation	GOV.UK
	Advice and resources https://www.lgfl.net/online-safety/default.aspx	London Grid for Learning (not for profit)
	Advice and resources https://beinternetlegends.withgoogle.com/en_uk	Parent Zone & Google
	Advice for Schools https://www.gov.uk/government/publications/education-for-a-connected-world	UK Council for Internet Safety
	Online safety and behaviour https://www.gov.uk/government/publications/teaching-online-safety-in-schools	DfE non-statutory guidance
	Harmful online challenges and online hoaxes https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes	DfE advice
Private fostering	Private fostering: local authorities https://www.gov.uk/government/publications/children-act-1989-private-fostering	DfE statutory guidance

Radicalisation	Prevent duty guidance https://www.gov.uk/government/publications/prevent-dutyguidance	Home Office
	Prevent duty advice for schools https://www.gov.uk/government/publications/protectingchildren-from-radicalisation-the-prevent-duty	DfE advice
	Educate Against Hate Website http://educateagainsthate.com/	DfE and Home Office
	Introduction to the Prevent Duty https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html	Home Office
	Making Prevent referrals that are robust, informed and with good intention https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/01-welcome.html	Home Office
Upskirting	Know your rights https://www.gov.uk/government/news/upskirting-know-yourrights	UK Government
Violence	Gangs and youth violence: for schools and colleges https://www.gov.uk/government/publications/advice-toschools-and-colleges-on-gangs-and-youth-violence	Home Office advice
	Ending violence against women and girls 2016-2020 strategy https://www.gov.uk/government/publications/strategy-to-endviolence-against-women-and-girls-2016-to-2020	Home Office strategy
	Violence against women and girls: national statement of expectations for victims https://www.gov.uk/government/publications/violenceagainst-women-and-girls-national-statement-of-expectations	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges https://www.gov.uk/government/publications/sexual-violenceand-sexual-harassment-between-children-in-schools-andcolleges	DfE advice
	Serious violence strategy https://www.gov.uk/government/publications/serious-violencestrategy	Home Office Strategy

Appendix 7 Low-level concerns regarding staff

The School strives to embed a culture of openness and transparency in which the School's values and expected behaviour, as set out in the Code of Conduct for Staff, are constantly reinforced by all staff.

All staff should feel enabled to share any concerns about their own behaviour, another member of staff's behaviour, or the behaviour of any adult working in or on behalf of the School with the appropriate member of staff as set out below.

[The distinction between an allegation and a low-level concern](#)

The term 'allegation' (in this context) means that it is alleged that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside of School that might make an individual unsuitable to work with children)

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- is not consistent with the Code of Conduct for Staff, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of such behaviour could include, but are not limited to, being over friendly with children, having favourites, taking photographs of children on their personal devices etc.

Staff are not expected to determine whether their concern is a low-level concern, serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination will be made by the Head.

[How to share low-level concerns](#)

It is important that low-level concerns are shared with the Head (or DSL) as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern and relevant incident(s). In the absence of the Head, staff should report their low level concerns to the DSL.

Where there is a conflict of interest in reporting low-level concerns to the Head, staff should report their low-level concerns to the DSL.

Where a concern relates to the Head, this should be reported to the Chair of Governors.

Concerns can be shared verbally, via email or via the Microsoft Office Form found at Appendix 8 in the first instance. The context in which the low-level concern arose and details which are chronological, precise and accurate as possible of the concern and relevant incident(s) must be provided.

Where details of the low level concern are provided verbally, the Head, or in the Head's absence the DSL, will ask the member of staff to complete the [online form here](#), either contemporaneously or immediately following the discussion.

The Head will check the accuracy of the record with the member of staff who raised the concern.

Low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

[Self-reporting](#)

Staff who find themselves in a situation which could be misinterpreted, might appear compromising to others, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for Staff are encouraged to self-report.

Self-reporting can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness of the individual's own actions or how they could be perceived; and is an important means of maintaining a culture where all staff aspire to the highest standards of conduct and behaviour.

Examples of behaviour to be self-reported could include accidentally replying to a pupil's personal email account, being contacted by a pupil on social media, driving a pupil in own car without obtaining prior written authorisation etc.

[Recording and reviewing low level concerns](#)

All low level concerns will be recorded online via the form and kept confidential and held securely accessible only by the Head and DSL. The record will include details of the context in which the concern arose and the action taken. The name of the member of staff sharing the concern will be noted however, where the member of staff wishes to remain anonymous this will be respected as far as possible.

The Head will maintain a central low level concerns log which will note the nature of the low level concern, parties involved, key dates, action taken etc. and will be kept confidential and held securely. The log will be reviewed by the Head on a half-termly basis, to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified, and an appropriate course of action taken in a timely manner. The Head will make a written record of the review.

An anonymised copy of the central log will be presented to the Pastoral, Safeguarding and Compliance Committee on a termly basis. The Committee's findings from the termly review will be fed-back to the Governing Body by the nominated Safeguarding Governor.

[Retention of records](#)

Records will be kept confidential, held securely and in compliance with the Data Protection Act 2018 and UK GDPR.

When the member of staff leaves and/or takes up new employment the records will be reviewed to ensure it still has value either as a safeguarding measure or because of its possible relevance to future claims and is therefore necessary to retain, or whether it can be securely destroyed.

[References](#)

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, e.g., misconduct or poor performance. Low level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. Where a low-level concern has met the threshold for referral to the LADO and found to be substantiated it is no longer deemed to be a Low Level Concern and will be included in a reference.

Appendix 8: Low-level Concern Form regarding staff

Please use this [online form](#) to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’. A QR code to this form can be found on Safeguarding Information Posters in departments.

You should provide a concise record including a brief context in which the concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

Appendix 9: Record of Concern relating to students (only for staff who do not have access to CPOMs)

Pupil Name:	
Form:	
Date and time of concern:	
Your account of the concern: (what was said -where possible using the exact words of the pupil, observed, reported and by whom)	
Additional Information: (nature and context of the concern / disclosure)	
Your response: (what did you do / say following the concern)	
Your name:	Your signature:

Your position in school:	Date and time of this recording:
Action and response of DSL/Head:	
Feedback given to member of staff reporting concern	Information shared with any other staff? If so, what information was shared and what was the rationale for this?
Lessons learnt:	
Name:..... Date:.....	

This policy was updated in August 2025 and will be presented to the full Governing Body for approval at the Governing Body meeting on 2nd December 2025.

In the interim, the updated policy was approved by the Chair of Governors on 5th September 2025 on behalf of the full Governing Body and has been circulated to all members of the Governing Body for their review and comment.



Signed.....

Gabrielle Gower
Chair of Governors

Checklist: Reporting process if you have a safeguarding concern

If you suspect a child is at immediate risk of harm immediately alert the Designated Safeguarding Lead (DSL):

Mrs Nicola Dawson for whole school 020 8951 6368. If Mrs Dawson is not available contact one of the Deputy DSLs immediately.

Mrs O'Leary Collen for Canons Sports Centre on 0208 9512 5402. If Mrs O'Leary Collen is unavailable please immediately contact Mrs Dawson as above.



If the allegation involves a DSL, report concerns directly to the Head



If you cannot contact the DSLs, Deputy DSLs or the Head alert Harrow Children & Family Services on:

- **020 8901 2690** (Mon-Fri 9-5pm)
- **020 8424 0999** (out of hours)



The parents/carers of the child involved, and the accused person will be informed of the allegation after consulting with the LADO

Checklist: Reporting process for allegations of abuse against members of staff, Governors, contractors, volunteers, supply staff or students who work with children

Immediately report allegations/complaints of abuse against: Staff (other than Head), DSL, Governor/Director, Contractors, Volunteers, Supply staff or Students who work with children

TO THE HEAD



If appropriate, the Head liaises with:

- DSL
- Chair of Governors
- Vice Chair (in Chair of Governor's absence)



The parents/carers of the child involved, and the accused person will be informed of the allegation after consulting with the LADO



The Head reports the matter to the Local Authority Designated Officer (LADO) within one working day

The School complies with any strategy formulated by relevant agencies



The parents/carers will be kept informed of the progress of the case

Effective support will be provided for employees facing an allegation

Checklist: Reporting process for allegations of abuse against the Head

Immediately report allegations of abuse against the Head, without notifying the Head, to the:

- Chair of Governors
(or in their absence)
- Vice Chair

STAFF: See Safeguarding prompt card, SharePoint or Microsoft Teams:

All Staff/General/Safeguarding/Safeguarding Governors' Contact Information for contact details

PARENTS: Write to the Chair of Governors/Vice Chair at the School address



Chair of Governors/Vice Chair will immediately report the matter to the LADO without notifying the Head

Checklist: Reporting process for low-level concerns relating to all staff

Immediately report all low-level concerns relating to any member of staff

TO THE HEAD



In the Head's absence, or if there is a conflict of interest with the Head, report the low-level concern

TO THE DSL